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VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF RICHMOND

JOHN MARSHALL COURTS BUILDING

BARBARA ANNE ANDERSON,

) CASE NO. 760CL06006790-00

Plaintiff,

vs.

ALFA LAVAL, INC., et al.,

Defendant.

DEPOSITION

OF

BARBARA ANNE ANDERSON

VOLUME II

Taken by Defendant General Electric Morrisville, North Carolina Thursday, January 11, 2007

Reported by: Ranae McDermott, RMR, CRR



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2 (Pages 189 to 192)

	Page 193		Page 195
1	On January 11, 2007, commencing at	1	testimony you can give us today about being exposed
2	10:05 a.m., the continuation of the deposition of	2	to anything you think contained asbestos at that
3	BARBARA ANNE ANDERSON, was taken pursuant to the Rules	3	glass plant, can you?
4	of the Supreme Court of Virginia on behalf of Defendant	4	A. I don't know where I got asbestos.
5	General Electric at the Holiday Garden Inn, 1500 RDU	5	Q. Okay.
6	Center Drive, Morrisville, North Carolina.	6	MS. KEYES: Randy, we will stipulate
7	PROCEEDINGS	7	that we're not claiming exposure were from the
8	Whereupon, BARBARA ANNE ANDERSON, having been	8	Owens-Illinois glass bottling plant.
9	previously duly sworn, was examined and testified as	9	MR. BURNS: Great. Thank you very
10	follows:	10	much, Ms. Anderson.
11	CROSS-EXAMINATION	1.1	THE WITNESS: You're welcome.
12	BY MR. BURNS:	12	MR. BURNS: And Ms. Keyes.
13	Q. Good morning, Mrs. Anderson.	13	MS. KEYES: You're welcome, Mr. Burns.
14	A. Good morning.	14	MR. RAINSFORD: Ms. Anderson, good
15	Q. Hi. My name is Randy Burns. I think I	15	morning. I've got a couple questions for you.
16	have just a couple things to ask you before we move	16	RECROSS-EXAMINATION
17	on to other things. I represent Owens-Illinois. And	17	BY MR. RAINSFORD:
18	I want to ask you about your employment at the glass	18	Q. I'm going to start with your father's
19	plant a little bit.	19	career. He worked as a pipe fitter for a while at
20	My my suspicion is that you were in the	20	the shipyard.
21	boxing department; is that right?	21	Do you recall what job he had after he left
22	A. Yes.	22	the shipyard?
23	Q. Or whatever they called it back then.	23	A. No, I don't.
24	At that time, the company assembled boxes	24	Q. Do you recall what job he had prior to
25	in one area and then they moved it down a conveyor	25	working at the shipyard?
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_		,	
1	belt to another and somebody else put the bottles in	1 2	A. No, I don't.
2	belt to another and somebody else put the bottles in the boxes, right?	2	A. No, I don't. Q. You discussed yesterday some construction
2	belt to another and somebody else put the bottles in the boxes, right? A. That's correct.	2	A. No, I don't. Q. You discussed yesterday some construction work that was done at various jobs that you had in
2 3 4	belt to another and somebody else put the bottles in the boxes, right? A. That's correct. Q. There's no manufacturing operation in terms	2 3 4	A. No, I don't. Q. You discussed yesterday some construction work that was done at various jobs that you had in the 1960s, '70s and '80s. What would you typically
2 3 4 5	belt to another and somebody else put the bottles in the boxes, right? A. That's correct. Q. There's no manufacturing operation in terms of the glass making where you were, right?	2 3 4 5	A. No, I don't. Q. You discussed yesterday some construction work that was done at various jobs that you had in the 1960s, '70s and '80s. What would you typically wear to work at those jobs?
2 3 4 5 6	belt to another and somebody else put the bottles in the boxes, right? A. That's correct. Q. There's no manufacturing operation in terms of the glass making where you were, right? A. No.	2 3 4 5 6	A. No, I don't. Q. You discussed yesterday some construction work that was done at various jobs that you had in the 1960s, '70s and '80s. What would you typically wear to work at those jobs? A. Myself?
2 3 4 5 6 7	belt to another and somebody else put the bottles in the boxes, right? A. That's correct. Q. There's no manufacturing operation in terms of the glass making where you were, right? A. No. Q. The lehrs and furnaces were in a different	2 3 4 5 6 7	A. No, I don't. Q. You discussed yesterday some construction work that was done at various jobs that you had in the 1960s, '70s and '80s. What would you typically wear to work at those jobs? A. Myself? Q. Yes, ma'am.
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	belt to another and somebody else put the bottles in the boxes, right? A. That's correct. Q. There's no manufacturing operation in terms of the glass making where you were, right? A. No. Q. The lehrs and furnaces were in a different part of the plant, right? A. Well, they were on the bottom floor. I was on the top floor. Q. Okay. And it was A. And there was an open space above. Q. Sure. And generally the ovens and the lehrs are at one end of the plant and then the finished products come out right at the other end of the plant? A. Okay. I don't know where the ovens were. Q. Okay. That's fine. Let me just cut to the chase then. Based on what Mr. Sturm asked you yesterday, I don't think you're claiming any exposure	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. No, I don't. Q. You discussed yesterday some construction work that was done at various jobs that you had in the 1960s, '70s and '80s. What would you typically wear to work at those jobs? A. Myself? Q. Yes, ma'am. A. A skirt, a top or a suit. Q. And do you recall roughly with what frequency the construction was being performed at any job site between 1962 and 1980? A. It was always ongoing at all of the different military facilities that I was at so
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	belt to another and somebody else put the bottles in the boxes, right? A. That's correct. Q. There's no manufacturing operation in terms of the glass making where you were, right? A. No. Q. The lehrs and furnaces were in a different part of the plant, right? A. Well, they were on the bottom floor. I was on the top floor. Q. Okay. And it was A. And there was an open space above. Q. Sure. And generally the ovens and the lehrs are at one end of the plant and then the finished products come out right at the other end of the plant? A. Okay. I don't know where the ovens were. Q. Okay. That's fine. Let me just cut to the chase then. Based on what Mr. Sturm asked you yesterday, I don't think you're claiming any exposure to asbestos at the Owens-Illinois glass plant, are	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. No, I don't. Q. You discussed yesterday some construction work that was done at various jobs that you had in the 1960s, '70s and '80s. What would you typically wear to work at those jobs? A. Myself? Q. Yes, ma'am. A. A skirt, a top or a suit. Q. And do you recall roughly with what frequency the construction was being performed at any job site between 1962 and 1980? A. It was always ongoing at all of the different military facilities that I was at, so Q. Would there be days or weeks where there was no construction ongoing at these buildings? MS. FISHER: Objection. Asked and answered. THE WITNESS: Yeah, I'm sure there were days where there was no construction going on. MR. RAINSFORD: That's all I have. Thank you, ma'am. THE WITNESS: You're welcome. MR. STURM: I have just one follow-up

3 (Pages 193 to 196)

1 BY MR. STURM: 2 Q. Can you provide us any information about 3 the about the work your father did either prior to 4 the time he worked at the shipyard or after he worked 5 at the shipyard? 6 MS. FISHER: Objection. Asked and 6 answered. 8 A. Yeah. I have no, you know, knowledge of 8 what he did. 9 Q. Okay. 11 A. I know that				
2 Can you provide us any information about the work your father did either prior to the time he worked at the shipyard? 3 the – about the work your father did either prior to the time he worked at the shipyard? 4 MS, FISHER: Objection. Asked and answered. 5 at the shipyard? 6 MS, FISHER: Objection. Asked and answered. 7 answered. 8 A. Yeah. I have no, you knów, knowledge of what he did. 9 what he did. 9 Okay. 10 Q. Okay. 11 A. 1 know that — 12 Q. So the type of work he was doing, the 13 trade, anything like that? 14 A. No. 15 MS, FISHER: Objection. Asked and 16 answered. 16 answered. 17 Q. Okay. Whether or not the — the work that 18 he did caused him to be around dusty conditions? 18 MS, FISHER: Objection. Form. 19 Q. Do you have any knowledge of that? 21 MS, FISHER: Objection. Form. 22 A. No, because I don't know exactly what type 23 of work he was doing. 24 Q. Okay. Thank you. 25 MR. COOK: FII ask a few more real 24 quick, since no one else covered this. 18 RECROSS-EXAMINATION 19 MR. STURM: Objection. Form. 19 MR. STURM: Objection. Form. 19 MR. STURM: Objection. Form. 19 Fage 198 10 MR. COOK: FII ask a few more real 24 quick, since no one else covered this. 10 Q. Ma'am, after we ended the deposition 25 yesterday and prior to today, did you meet with your 27 attorneys at all? 2 A. No. They took me — took me home. That 29 was all. 10 Q. That was all? 2 Q. And are you on any medication today? 14 A. No. They took def on my pain pill. 15 Q. And are you on any medication today? 16 A. No. They took def of on my pain pill. 17 Q. Okay. 18 A. A. And — and I took a cholesterol pill. 19 Q. And so to your knowledge, you're able to 29 give us your best testimony today? 21 A. Yes. I — I can. 22 Q. Great. 23 MR. COOK: That's all the questions I and prior to today, and your best testimony today? 24 Q. Okay. 25 A. No, breasure I doub, did you review any documents in preparation for today's deposition? 26 Q. Okay. And did you breathe the dust? 27 MR. STURM: Objection. Form. 28 MR. ST		Page 197		Page 199
2 Can you provide as any information about the work your father did either prior to the time he worked at the shipyard? after he worked at the shipyard? 8 M. FISHER: Objection. Asked and answered. See A. Yeah. I have no, you know, knowledge of what he did. O. O. Okay. 10 O. O. Okay. 11 A. I know that — 12 Q. So the type of work he was doing, the trade, anything like that? 13 I rade, anything like that? 14 A. No. 15 MS. FISHER: Objection. Asked and answered. See A. Okay. First I want to go back to the time that your father worked at the Portsmouth Naval Shipyard as a pipe coverer and insulator. A. Um-hum. See A. Okay. First I want to go back to the time that your father worked at the Portsmouth Naval Shipyard as a pipe coverer and insulator. A. Um-hum. See Okay. First I want to go back to the time that your father worked at the Portsmouth Naval Shipyard as a pipe coverer and insulator. A. Um-hum. See Okay. First I want to go back to the time that your father worked at the Portsmouth Naval Shipyard as a pipe coverer and insulator. A. Um-hum. See Okay. First I want to go back to the time that your father worked at the Portsmouth Naval Shipyard as a pipe coverer and insulator. A. Um-hum. See Okay. First I want to go back to the time that your father worked at the Portsmouth Naval Shipyard as a pipe coverer and insulator. Shipyard as a pipe cover and insulator. Shipyard as a pipe covery and intry of the your father worked at the Portsmouth Naval Shipyard as a pipe cover and insulator. Shipyard as a pipe cover and insulator. A. Um-hum. Shipyard as a pipe cover and insulator. Shipyard	1	BY MR_STURM:	1	MS, FISHER: Okay. Anyone else?
the time he worked at the shipyard? MS. FISHER: Objection. Asked and answered. A. Yeah. I have no, you know, knowledge of what he did. O. Okay. MS. Risher: Objection. Asked and answered. NS. FISHER: Objection. Asked and answered. MS. FISHER: Objection. Form. A. No, because I don't know exactly what type of work he was doing. MS. FISHER: Objection. Form. A. No, because I don't know exactly what type of work he was doing. MS. FISHER: Objection. Form. A. No, because I don't know exactly what type of work he was doing. MS. FISHER: Objection. Form. A. No, because I don't know exactly what type of work he was doing. MS. FISHER: Objection. Form. A. No, because I don't know exactly what type of work he was doing. MR. FISHER: Objection. Form. MS. FISHER: Objection. Asked and answered. D. Oyou have any knowledge of that? MR. STURM: Objection. Form. MR. FISHER: O, Mrs. Anders worked at the Portsmouth Naval Shipyard as a pipe coverer and insulator. A. No, because I don't know we know that the objection were bis clothes in? MR. STURM: Objection. Form. MR. STURM: Objection. Form. MR. STURM: Objection. Form. MR. STURM: Objection. Form. A. Well, dust and dirt would come from the clothes. Cokay. Mand what kind of condition did that rutomeys at all? Okay. Did – after we concluded yesterday and prior to today, did you review any documents in preparation for today's deposition? A. No. Okay. And what kind of condition did ware products? MR. STURM: Objection. Form. MR. STURM: Objection. Form. A. Well, dust and dirt would come from the clothes. Cokay. And what kind of condition did ware products? MR. STURM: Objection. Form. A. Well, dust and dirt would			2	li de la companya de
4 the time he worked at the shipyard? 5 at the shipyard? 6 MS. FISHER: Objection. Asked and 7 answered. 8 A. Yeah. I have no, you know, knowledge of 9 what he did. 9 (O. Qay. 11 A. I know that — 12 Q. So the type of work he was doing, the 13 trade, anything like that? 14 A. No. 15 MS. FISHER: Objection. Asked and 16 answered. 17 Q. Okay. Whether or not the — the work that 18 he did caused him to be around dusty conditions? 19 MS. FISHER: Objection. Form. 10 Q. Do you have any knowledge of that? 11 MS. FISHER: Objection. Form. 12 Q. No you have any knowledge of that? 13 MS. FISHER: Objection. Form. 14 A. No. because I don't know exactly what type 15 of work he was doing. 16 answered. 17 MS. FISHER: Objection. Form. 18 he did caused him to be around dusty conditions? 19 MS. FISHER: Objection. Form. 20 Q. Do you have any knowledge of that? 21 MS. FISHER: Objection. Form. 22 A. No, because I don't know exactly what type 23 of work he was doing. 24 Q. Okay. Thank you. 25 MS. FISHER: Objection. Form. 26 A. No. They took me — took me home. That 27 a was all. 28 Q. Okay. And what kind of condition did that 29 was all. 29 Q. That was all? 20 Q. That was all? 21 Q. Okay. David way of the deposition 29 and prior to today, did you review any documents in preparation for today's deposition? 29 and prior to today, did you review any documents in preparation for today's deposition? 20 Q. Dokay. Thank you. 21 Q. Okay. Thank you. 22 A. No, They book me — took me home. That 23 and prior to today, did you review any documents in preparation for today's deposition? 24 A. No. They took me — took me home. That 25 Q. And are you on any medication today? 26 A. A. And — and I took a cholesterol pill. 27 Q. Okay. Thank you. 28 MR. COOK: That's all the questions I 29 Q. And so to your knowledge, you're able to give us your best testimony today? 20 Q. Okay. And bow did you become familiar with the names of the position. 29 A. Yes. I — I can. 20 Q. Okay. And how did you become familiar with the names of those three products? 20 Q. Okay. An		the about the work your father did either prior to	3	CROSS-EXAMINATION
5 at the shippyard? 6 MS. FISHER: Objection. Asked and 7 answered. 8 A. Yeah. I have no, you know, knowledge of what he did. 10 Q. Okay. 11 A. I know that — 12 Q. So the type of work he was doing, the 13 trade, anything like that? 14 A. No. 15 MS. FISHER: Objection. Asked and 16 answered. 17 Q. Okay. Whether or not the — the work that he did caused him to be around dusty conditions? 19 MS. FISHER: Objection. 10 Q. Do you have any knowledge of that? 11 A. I know that — 12 Q. Okay. Ms. FISHER: Objection. Form. 13 A. No. 15 MS. FISHER: Objection. 16 A. No. 17 MS. FISHER: Objection. 18 MS. FISHER: Objection. 19 MS. FISHER: Objection. 19 MS. FISHER: Objection. 20 Q. Okay. Thank you. 21 MS. FISHER: Objection. 22 A. No, because I don't know exactly what type of work he was doing. 23 Q. Okay. Thank you. 24 Q. Okay. Thank you. 25 MS. FISHER: Objection. 26 Wash. Fisher objection. 27 MS. FISHER: Objection. 28 MS. FISHER: Objection. 29 MS. FISHER: Objection. 20 Q. Okay. Thank you. 20 MS. FISHER: Objection. 21 MR. COOK: Til ask a few more real quick, since no one else covered this. 22 Q. Okay. And what kind of condition did that read to the properties of the clothes, check the pockets for anything that was in them and then put them in the washing machine. 21 Q. Okay. And what kind of condition did that read to the clothes, check the pockets for anything that was in them and then put them in the washing machine. 29 Q. Okay. Thank you. 20 Q. That was all? 21 Q. That was all? 22 Q. That was all? 23 A. No. They took me — took me home. That was all. 24 and prior to today, did you week way documents in preparation for today's deposition? 25 Q. Marm, after we ended the deposition preparation for today's deposition? 26 Q. That was all. 27 Q. Okay. And day ou brain the deposition of the clothes. 28 Q. Okay. And day ou brain the deposition of the clothes. 39 Q. Okay. And what kind of condition did that on the clothes. 30 Q. Okay. And what kind of condition did that on the clothes. 31 Q. Okay. And dwhat kind of condition did that on t		the time he worked at the shipyard or after he worked	4	BY MS. FISHER:
answered. A. Yeah. I have no, you know, knowledge of what he did. A. Yeah. I have no, you know, knowledge of what he did. Q. Okay. A. I know that — Q. So the type of work he was doing, the trade, anything like that? A. No. MS. FISHER: Objection. Asked and answered. Q. Okay. Whether or not the — the work that he did caused him to be around dusty conditions? MS. FISHER: Objection. Form. A. No, because I don't know exactly what type of work he was doing. A. No, because I don't know exactly what type of work he was doing. A. No, because I don't know exactly what type of work he was doing. A. No, because I don't know exactly what type of work he was doing. A. No, because I don't know exactly what type of work he was doing. A. No, because I don't know exactly what type of work he was doing. A. No, because I don't know exactly what type of work he was doing. A. No, because I don't know exactly what type of work he was doing. A. No, because I don't know exactly what type of work he was doing. A. No, because I don't know exactly what type of work he was doing. A. No, because I don't know exactly what type of work he was doing. A. No, BYME. COOK: TIl ask a few more real quick, since no one else covered this. RECROSS-EXAMINATION BY ME. COOK: A. No. BY ME. COOK: Q. That was all? O. Way. Thank you, was all. O. Way. Thank you were doing the laundry? A. No. MR. STURM: Objection. Form. A. Well, dust and dirt would come from the clothes. O. Okay. And what kind of condition did that The work of the were you were doing the laundry? A. No. They took me — took me home. That was all? O. Okay. Thank you, may and the was all. O. Okay. And what kind of condition did that The was all. O. Okay. Thank you were doing the laundry? A. No. O. Okay. Thank you. O. Okay. Thank you. O. Okay. Thank you. O. Okay			5	Q. Mrs. Anderson, I'm going to ask you a few
answered. A. Yeah. I have no, you know, knowledge of what he did. Q. Okay. A. I know that — Q. Os of the type of work he was doing, the trade, anything like that? A. No. MS. FISHER: Objection. Asked and answered. Q. Okay. Whether or not the — the work that he did caused him to be around dusty conditions? MS. FISHER: Objection. Form. A. No, because I don't know exactly what type of work he was doing. MS. FISHER: Objection. Form. A. No, because I don't know exactly what type of work he was doing. MS. FISHER: Objection. Form. A. No, because I don't know exactly what type of work he was doing. MS. FISHER: Objection. Form. A. No, because I don't know exactly what type of work he was doing. MS. FISHER: Objection. Form. A. No, because I don't know exactly what type of work he was doing. MR. COOK: I'll ask a few more read quick, since no one else covered this. RECROSS-EXAMINATION BY MR. COOK: MR. DONE: MR. A. No. They took me — took me home. That was all? Okay. Did — after we concluded yesterday and prior to today, did you review any documents in preparation for today's deposition? MR. A. No. MR. STURM: Objection. Form. A. Well, dust and dirt would come from the learning by the work of the pockets for anything that was in them and then put them in the washing machine. Create in the kitchen where you were doing the laundry? MR. STURM: Objection. Form. A. Well, dust and dirt would come from the learning structure of today, did you review any documents in preparation for today, did you review any documents in preparation for today's deposition? A. No. Cokay. And are you on any medication today? A. No. A. And — and I took a cholesterol pill. Q. Okay. A. And so to your knowledge, you're able to give us your best testimony today? A. Yes. I — I can. MR. COOK: That's all the questions I MR. COOK: That's all the questions I MR. BENNETT: Objection. Form, asked			6	questions.
8 A. Yeah, I have no, you know, knowledge of 9 what he did. 10 Q. Okay. 11 A. I know that — 12 Q. So the type of work he was doing, the 13 trade, anything like that? 14 A. No. 15 MS. FISHER: Objection. Asked and 16 answered. 17 Q. Okay. Whether or not the — the work that 18 he did caused him to be around dusty conditions? 19 MS. FISHER: Objection. 10 Q. Do you have any knowledge of that? 11 MS. FISHER: Objection. 12 Q. Oby on have any knowledge of that? 13 MS. FISHER: Objection. 14 A. No, because I don't know exactly what type 15 MS. FISHER: Okjection. Form. 16 A. No, because I don't know exactly what type 17 A. No, because I don't know exactly what type 18 MR. COOK: FIl ask a few more real 29 quick, since no one else covered this. 21 quick, since no one else covered this. 22 quick, since no one else covered this. 23 quick, since no one else covered this. 24 quick, since no one else covered this. 25 MR. FISHER: Okjection. 26 Q. Maa'm, after we ended the deposition 27 attorneys at all? 28 A. No. They took me — took me home. That 29 was all. 20 Q. Day. Did — after we concluded yesterday 21 and prior to today, did you review any documents in 21 preparation for today's deposition? 22 A. No. 23 And are you on any medication today? 24 A. No. 25 MR. COOK: That's all the questions I 26 Q. Okay. And do you breathe the dust? 27 A. No. 28 A. No. They took me — took me home. That 29 was all. 20 Q. Okay. And did you breathe the dust? 29 A. No. They took me — took me home. That 29 and prior to today, did you review any documents in 29 preparation for today's deposition? 20 Q. Okay. And so to your knowledge, you're able to 21 give us your best testimony today? 22 A. And and and I took a cholesterol pill. 23 Q. Okay. And have a did the position of form. 24 A. No. 25 MR. COOK: That's all the questions I 26 MR. COOK: That's all the questions I 27 MR. BENNETT: Objection form. 28 MR. COOK: That's all the questions I 29 MR. COOK: That's all the questions I 20 MR. COOK: That's all the questions I 21 MR. COOK: That's all the question		-	7	A. Okay.
y what he did. Q. Okay. A. Iknow that — Q. So the type of work he was doing, the trade, anything like that? A. No. MS. FISHER: Objection. Asked and answered. Q. Okay. Whether or not the — the work that he did caused him to be around dusty conditions? MS. FISHER: Objection. Q. Do you have any knowledge of that? MS. FISHER: Objection. Form. A. No, because I don't know exactly what type of work he was doing. Q. Okay. Thank you. MS. FISHER: Objection. Form. A. No, because I don't know exactly what type of work he was doing. Q. Okay. Thank you. MS. FISHER: Okay. Anybody else? I MR. COOK: Pll ask a few more real quick, since no one else covered this. RECROSS-EXAMINATION BY MR. COOK: Q. Ma'am, after we ended the deposition yesterday and prior to today, did you neet with your attorneys at all? A. No. They took me— took me home. That was all. Q. That was all. Q. That was all? Q. Okay. Did — after we concluded yesterday and prior to today, did you meet with your attorneys at all? A. No. C. Dear after we concluded yesterday and prior to today, did you meet with your attorneys at all? A. No. C. Okay. Did — after we concluded yesterday and prior to today, did you review any documents in preparation for today's deposition? A. Cooks. C. Day on have any knowledge, you're able to give us your best testimony today? A. A. Okay. C. Okay. A. A. Okay. C. Okay. A. And — and I took a cholesterol pill. C. Okay. A. And so to your knowledge, you're able to give us your best testimony today? A. A. Okay. Bondex, Georgia-Pacific, and US 21 Gypsum. C. Okay. And how did you become familiar with the arms of the joint arms of the joint and the put them in the washing machine. C. Okay. And was thick the pockets for anything that was in them and then put them in the washing machine. C. Okay. And was adid yesterday of the potential of the put the put them in the washing machine. C. Okay. And did you breathe the dust? C. Okay. Thank you. C. Okay. C. Okay. Thank you. C. Okay. C. Okay. Thank you. C. Okay. C. Okay. C. Okay. C. Okay. C. Okay. C. O			8	Q. Okay. First I want to go back to the time
10 Q. Okay. 11 A. Iknow that — 12 Q. So the type of work he was doing, the 13 trade, anything like that? 14 A. No. 15 MS. FISHER: Objection. Asked and 16 answered. 17 Q. Okay. Whether or not the — the work that 18 he did caused him to be around dusty conditions? 18 he did caused him to be around dusty conditions? 19 MS. FISHER: Objection. 20 Q. Do you have any knowledge of that? 21 A. No. because I don't know exactly what type 22 of work he was doing. 24 Q. Okay. Thank you. 25 MS. FISHER: Okay. Anybody else? 26 MS. FISHER: Okay. Anybody else? 27 A. No. because I don't know exactly what type 28 of work he was doing. 29 Q. Okay. Thank you. 20 MS. FISHER: Okay. Anybody else? 21 MR. COOK: I'll ask a few more real 20 quick, since no one else covered this. 21 A. No. They was all? 22 A. No. They took me — took me home. That 23 was all. 24 Q. Ma' ara, after we concluded yesterday and prior to today, did you meet with your attorneys at all? 25 MS. They took me — took me home. That 26 was all. 27 Q. Okay. And did you breathe the dust? 28 MR. STURM: Objection. Form. 29 A. No. They took me — took me home. That 29 was all. 30 Q. That was all? 41 A. No. 42 MR. STURM: Objection. Form, 43 MR. STURM: Objection. Form, 44 A. No. They are ended the deposition 45 yesterday and prior to today, did you meet with your attorneys at all? 46 A. No. 47 A. No. 48 When your father came home from work, what 49 MR. STURM: Objection. Form. 49 AN. FISHER: Objection. 40 A. Mr. STURM: Objection. Form. 41 A. Uh-hum. 40 A. No. They were dusty and dirty. 41 A. M. Objection. Form. 42 A. No. They on the was directly on the deposition of the dustry of the was directly on the was			9	that your father worked at the Portsmouth Naval
11 A. I know that — Q. So the type of work he was doing, the strade, anything like that? 12 A. No. MS. FISHER: Objection. Asked and answered. 13 answered. 14 A. No. MS. FISHER: Objection. Asked and answered. 15 MS. FISHER: Objection. Form. 16 answered. 17 Q. Okay. Whether or not the — the work that he did caused him to be around dusty conditions? 18 MS. FISHER: Objection. 19 MS. FISHER: Objection. 20 Do you have any knowledge of that? 21 MS. FISHER: Objection. Form. 22 MS. FISHER: Objection. 23 of work he was doing. 24 Q. Okay. Thank you. 25 MS. FISHER: Okay. Anybody else? 26 Q. Okay. Thank you. 27 attorneys at all? 28 A. No. They took me — took me home. That was all? 29 Q. That was all? 20 Q. That was all? 21 A. Um-hum. 22 Q. Whether or not the — the work that answered. 23 of work he was doing. 24 Q. Okay. And what did you do with your father's clothes before you washed them? 29 MR. FTURM: Objection. Form. 20 Day ou have any knowledge of that? 21 MR. COOK: Ill ask a few more real quick, since no one else covered this. 22 RECROSS-EXAMINATION 23 BY MR. COOK: 24 Q. Okay. And what kind of condition did that the clothes, check the pockets for anything that was in them and then put them in the washing machine. 24 Q. Okay. And what kind of condition. 25 When your father came home from work, what condition were his clothes before you washed them? 26 Q. Okay. And what did you do with your father's clothes before you washed them? 27 MR. FURM: Objection. Form, 28 A. No, because I don't know exactly what type the clothes, check the pockets for anything that was in them and then put them in the washing machine. 29 Q. Okay. And what kind of condition did that 29 Wash and fire we ended the deposition 30 WR. STURM: Objection. Form. 31 A. Um-hum. 42 Q. Okay. And what did you do with your father's clothes before you washed them? 43 A. No, because I don't know exactly what the clothes, clock the pockets for anything that was in them and then put them in the washing machine. 20 Q. Okay. An			10	Shipyard as a pipe coverer and insulator.
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4 (Pages 197 to 200)

Page 203 Page 201 MR. COOK: Object to the form. 1 A. You know, through observing them at the 1 2 workplace when I walked through, those were the names 2 MR. PORETZ: Objection. that are familiar to me --MR. BENNETT: Object to the form. 3 3 4 Q. Okay. 4 Leading. 5 5 A. -- over the years of civil service work. A. I just recall those three products that O. Okay. Okay. Now, I'm going to ask you 6 I've seen at these various locations. 6 about each location where you worked. When you 7 Q. Okay. Those three products; Bondex 7 Georgia-Pacific and US Gypsum? started at Oceana, you were a telephone operator; is 8 8 that right? 9 MR. COOK: Objection to the form, 9 10 10 A. Yes. leading. Q. And then you became a supply clerk? 11 MR. PORETZ: Objection. 11 Q. When you saw workers working with these 12 12 three products, what -- I'm sorry. I already asked Q. During that time, did you see construction 13 13 14 or renovation going on at the location where you 14 you this. Let me move on. 15 You said the conditions were dusty. Did 15 worked in Oceana? MR. PORETZ: Objection to form. 16 the dust go into your work area? 16 MR. BENNETT: Object to form. MR. COOK: Objection. Asked and 17 17 A. I'm sure it did. It was, you know, an open 18 18 answered. 19 A. Yeah, it -- well, it was ongoing in, you 19 passageway. 20 know, all of these locations. 20 Q. Okay. And would you have breathed that 21 Q. Okay. Can you describe for us what type of 21 dust? 22 work you remember seeing ongoing? MR. BENNETT: Object to form. 22 23 MR. COOK: Object to form. MR. PORETZ: Objection. 23 24 A. Yeah. You know, the partitions being put 24 MR. COOK: Objection. 25 up, the drywall being put up, the - the mud being 25 A. Absolutely not if I knew it would bother Page 204 Page 202 1 put on them. 1 me. 2 MR. BENNETT: Withdraw the objection. 2 Q. Um-hum. Q. You wouldn't have breathed it if you could A. And then, you know, containers or buckets 3 3 have helped breathing it; is that what you're saying? around the site. 4 Q. Okay. And what kind of conditions were A. Correct. 5 5 created when that work was going on? 6 MR. PORETZ: Objection. Leading, 6 7 7 MR. COOK: Object to the form. form. MR. BENNETT: Object to form. 8 MR. COOK: Objection. 8 Q. So are you saying you might have breathed MR. PORETZ: Objection. Foundation. 9 9 it? A. Well, when you walked past, you know, there 10 10 would, of course, be dust and kind of like on the 11 MR PORETZ: Objection. 11 MR. COOK: Objection. Form. 12 floors and, you know -- it was dusty. 12 A. If I knew then what I know today, I would Q. Okay. In your work area, can you describe 13 13 have turned around and gone home or I would have gone 14 where your office or your desk was located? to the authorities and reported that they can't do 15 MR. BENNETT: Object to form. 15 A. At this location or at --16 that. 16 17 Q. Okay. Did you see any warnings on the 17 Q. At -- at Oceana. products that you saw when you were working at A. It was in the main -- the main room. There 18 18 19 was a large room that had a lot of desks and then, 19 Oceana? you know, a hallway you would go to get to it and --20 A. I don't recall any warnings. 20 Q. Okay. If you had seen warnings, what would 21 and then there were rooms off to the sides. 21 22 you have done? 22 O. Okay. 23 A. And mine was out in the open. 23 MR. COOK: Objection. 24 Q. Okay. And which products do you remember 24 MR. PORETZ: Objection. Speculative, 25 seeing at Oceana when the work was ongoing? 25 form,

5 (Pages 201 to 204)

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Page 205

- A. Well, the same response that I just gave. I certainly would have gotten away from it and I would have reported it so that no one else would get injured.
- Q. Okay. All right. Now, I'm going to move on to Dam Neck training when you were an accounts maintenance clerk.
 - A. Um-hum.
- 9 Q. Did you see construction or renovation going on at that location? 10

MR. COOK: Objection.

MR. BENNETT: Form, asked and

13 answered.

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you see?

- A. I can only say that it was an ongoing type 15 of thing. I can't, you know, pinpoint a specific, you know, construction like that.
- Q. Okay. And what was the type of work 17 18 that -- that you would have seen --

MR. BENNETT: Object to form.

Q. -- at Dam Neck training?

renovation work was going on?

A. Ask your question again.

Misstates prior testimony.

10 Misstates prior testimony.

MR. COOK: Same objection.

MR. BENNETT: Object to form.

MR. BENNETT: Object to form.

Q. Okay. You said that you saw work going on

accounts maintenance clerk. What kind of work did

MR. BENNETT: Object to form.

A. Yeah. What I said was during my 22 years

drywall, the patch, all this stuff. I remember these

at Dam Neck training facility when you were an

- 23 A. What type of work?
- Q. What type of -- you said you saw work 24 ongoing. What -- what type of construction or

Page 207

partitions, two-by-fours. They would put sheetrock up, or whatever. They put that white board up and

3 they would put the mud up. And then after it was dry, I remember them sanding it, either took a --4

like a trowel in their hand or one on a pole. 5

O. Okay. And when you saw that work, what kind of condition did it create?

MR. COOK: Objection. Form.

- 9 A. Well, if they were sanding, of course, it 10 made, you know, a dusty residue everywhere.
- O. Okay. And which products did you see when 11 you were at Dam Neck training facility? 12

MR. BENNETT: Object to form.

MR. COOK: Objection to form.

MR. BENNETT: Asked and answered. 15

Misstates prior testimony. Leading. 16 17

- A. These three products that I recall --
- 18 O. Um-hum.
- 19 A. - are the ones I saw. But I saw them in several locations and I cannot pinpoint, you know, it 20

21 was at that location.

Q. Okay. Now, we'll move on. We're going to 22

talk about -- again, we're talking about specific 23

24 locations.

So the next one we'll talk about is Public

Page 206

Page 208 Health Hospital where you were a voucher examiner.

Did you see construction or renovation going on at 2

the Public Health Hospital? 3

MR. COOK: Objection to form.

MR. BENNETT: Objection. Form, asked 6 and answered.

7 A. Same thing with the other buildings. There was always renovation on the old buildings. 8

- Q. Okay. And is the renovation process the 9 one that you've described for Dam Neck training and 10 for Oceana? 11
- 12 A. They were all --

MR. PORETZ: Objection to form.

- A. They were all the same or similar process.
- 15 Q. Okay. And what type of condition was created in the Public Health Hospital when you saw 16 17

that work ongoing?

MR. BENNETT: Object to form.

19 MR. COOK: Objection to form. A. The same conditions in all these cases. 20

- 21 Q. Um-hum.
- 22 A. If they were sanding, it was dusty. And
- 23 anytime you're working in maintenance and
- 24 construction, you know, they do create a mess.
 - Q. Okay. Okay --

you on this day I saw that construction going on. Q. I understand. Thank you.

12 in civil service, I saw ongoing renovations; the

14 names, and it was -- it was a given. I cannot tell

Will you describe the process that the 18 workers went through when you observed them doing work?

MR. PORETZ: Objection. Asked and

21 answered, form.

22 MR. BENNETT: Objection. And 23 misstates prior testimony.

A. Okay. What I recall from over the years of 24 25 observations is that they would put -- put up

6 (Pages 205 to 208)

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Page 209 Page 211 you know, clean up the mess that they created when When you were at your work area and this 1 they had done all of the sanding and everything. work was -- the renovations were ongoing, did you 2 2 O. And was that cleanup process dusty? breathe the dust that was created? 3 3 MR. COOK: Objection. Form, leading. 4 MR. BENNETT: Objection. 4 A. Yes, it was -- whatever came off when they 5 MR. COOK: Objection to form. 5 sanded was swept and got in the area, so it was 6 Foundation. 6 7 7 A. I can only say I was in the same area and Q. And you say the dust was in the air after 8 it was an open space, so I can only assume that I 8 they were sweeping. It was the same air that was 9 9 around your work area. O. Okay. The next place you worked from 1974 10 10 MR. PORETZ: Objection to form. to 1975 was the Naval Air Station and Supply; is that 11 11 MR. COOK: Objection. 12 correct? MR. PORETZ: Form, leading. 13 13 A. Yes. MR. COOK: Same objection. 14 Q. Okay. During that time period, did you see 14 Q. Is that right? 15 construction or renovation going on? 15 16 A. Yes. Most of my jobs were out in the open. MR. COOK: Objection. Form. 16 And if a -- and if a particular type of maintenance 17 A. *The same response. I saw it in each of 17 or renovation was going on, it was done within a 18 the locations I was at; but, you know, that's all I 18 fairly close proximity. 19 19 20 Q. Okay. So did you breathe the dust that was Q. Okay. 20 21 in your open work area? A. * -- can say. 21 MR. COOK: Objection. Form, leading. 22 Q. The type of work that you described being 22 A. Yes, I did, because it was in, you know, an 23 done at the previous locations, is it the same 23 24 open area. process? 24 25 Q. Okay. The cleanup process that you MR. COOK: Objection. Form. 25 Page 212 Page 210 described at the Naval Air Station when you were in A. Yeah. On the last question, I said I -- it 1 supply, was that a process that went on in the prior 2 was -- I saw it being --2 locations at the Public Health Hospital, at Dam Neck 3 THE WITNESS: Would you repeat what I 3 training and at Oceana? 4 said? I want to make sure I get it right. 4 MR. COOK: Objection. Form, leading. 5 5 (*ANSWER READ.) 6 A. Okay. As I said before, you know, since I A. In that response, meaning I saw ongoing 6 7 started the government until the end of the over the years in all of these locations. There was government, you know, in the older days it was going 8 always some of this, you know, construction being 8 on, you know, and I was really aware of it. Later as 9 9 done. it got towards the time I was leaving the 10 10 Q. Okay. government --11 A. Okay. And your next question? 11 O. Um-hum. Q. When this work was ongoing, what condition 12 12 A. -- I didn't notice as much because the 13 was created in the Public -- I'm sorry -- in the 13 buildings were newer and they were using military Naval Air Station, what condition was created by the 14 14 construction to -- you know, to make new facilities. 15 15 work --Q. Okay. Do you remember the products that 16 MR. COOK: Objection. 16 you remember -- I'm sorry. Strike that. 17 Q. -- that was on going? 17 What products do you remember seeing when 18 MR. COOK: Objection to form. 18 you were at the Naval Air Station in terms of the A. Anytime I was around any type of -- of this 19 joint compound? 20 type of construction, there was always dust and, you 20 MR. BENNETT: Objection. 21 know, sort of clean up and that -- that's what I

7 (Pages 209 to 212)

MR. COOK: Objection to form.

A. Okay. I just remember those three names.

prior testimony. Lack of foundation.

MR. BENNETT: Leading. Misstates

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remember.

Q. Okay. When you say "cleanup," do you

A. Well, workers would have to sweep up and,

mean -- what do you mean by "cleanup"?

Page 215 Page 213 they would mark off the room and then they would come I can't tell you which one. back and put up drywall and then they -- they would Q. Okay. So do you remember Bondex at the 2 mud the drywall; wait for it to dry. They would come 3 locations? back after it was dry and they'd sand it. Sometimes MR. COOK: Objection. Form and 4 they would come back twice and sand it. But, you mischaracterizes the prior testimony. know, that's -- that's all I can tell you. 6 MR. BENNETT: Objection to form. 6 Q. Okay. And did the workers that you saw, 7 Asked and answered, lacks foundation. 7 did they clean up after they were finished putting up A. Yeah. I can only say that those are the 8 8 three over the years that I remember seeing on the the partitions? 9 9 MR. COOK: Objection. Form. 10 job sites. I don't -- I don't recall if it was 10 A. Sure. 11 specifically one or the other. 11 Q. And what type of condition did that create? 12 Q. Okay. So the three that you recall are 12 MR, COOK: Objection to form. 13 Bondex, United States Gypsum and Georgia-Pacific? 13 A. It created a dust residue when they did the MR. BENNETT: Objection. Leading, 14 14 15 sanding. asked and answered, form. 15 Q. Okay. Did you breathe the dust? 16 MR. COOK: Objection. 16 MR. COOK: Objection. Form. 17 Mischaracterizes prior testimony. 17 A. Since I was around it, I assume I did. 18 MR. BENNETT: Lacks foundations. 18 O. Okay. The next location we'll talk about MS. KEYES: Come on. You know under 19 19 is the naval station in Norfolk at the staff civil 20 the Virginia rules, confine your objections to form, 20 engineer's office. It was from 1976 to 1978; is that 21 please. 22 right? 22 MR. COOK: Mary, just for the 23 A. Correct. 23 record --Q. Okay. In the staff civil engineer's MS. KEYES: I learned that from David. 24 24 office, did you see construction and/or renovation MR. COOK: Just for the record, we're 25 Page 216 Page 214 trying to give her as much notice as we can to 1 going on? 1 MR. COOK: Objection. Form. 2 correct the deficiencies. 2 A. I can't recall, you know, on that one. You 3 MS. KEYES: I understand, Eric, and I 3 know, I just know that most of -- you know, all the 4 appreciate it. others that I was at, you know, I just want to be Q. Okay. We're going to move on to CINCLANT 5 5 honest and say either I recall it or I don't. I -- I Fleet, the first time you were there. That was in 6 6 can't recall that one. 7 1975 and '76; is that right? 7 Q. Okay. And after the naval station at the 8 8 A. Correct. staff civil engineer's office, is it correct that you 9 O. Okay. At that location, did you see 9 went back to CINCLANT Fleet? 10 10 construction or renovation going on? 11 A. Yes. MR. COOK: Objection. Form. 11 O. Okay. At that location, did you see --A. Okay. CINCLANT Fleet was one of the older 12 12 13 during that time period, your second service time at 13 buildings. I saw maintenance men. It was an CINCLANT Fleet, did you see construction and/or 14 acceptable practice. That's all I can tell you. renovation going on? Q. Okay. And what was an acceptable practice? 15 15 MR. COOK: Objection. Form. 16 A. To go around and, you know, change 16 A. Okay. That's another real old building. positions of, you know, different rooms to create, 17 They were -- they were -- you know, there was ongoing you know, subdivided rooms and, you know, to put up 18 18 type of construction type maintenance projects that 19 partitions. 19 20 were done. Q. Okay. In the process of putting up those 20 Q. And is it the same process that you have 21 partitions, would you describe that? 21 described for us previously? 22 MR. PORETZ: Objection to form, asked 22 23 A. Yes. 23 and answered. MR. COOK: Objection. Form. 24 A. When you put up those rooms, what I 24 Q. In creating the partitions? observed was they would use two-by-fours. They --25 25

8 (Pages 213 to 216)

	Page 217		Page 219
1	MR. COOK: Objection. Form.	1	MS. FISHER: Objection. Form.
1 2	A. Yes.	2	MR. STURM: That's the page.
3	Q. Okay. And what type of condition was	3	THE WITNESS: Oh.
د 4	created as a result of the construction and	4	MS. KEYES: Do you want to read her
5	renovation that you observed?	5	the former contents, what she was talking about
6	MR. COOK: Objection. Form.	6	there?
7	A. Dusty, dirty.	7	MR, BENNETT: Sure.
8	Q. Okay. Did you breathe the dust	8	MS. FISHER: Yeah. These pages are
9	MR. COOK: Objection to form.	9	weird. It goes 1, 2, 3, so. I'm sorry, which page
10	Q that was created?	10	are you on?
11	MR. COOK: I'm sorry. Objection.	11	MR. BENNETT: I was on page 101, lines
12	Form.	12	4 through 9.
	A. I was there. I can only assume I did.	13	MS. FISHER: Let me just mark it for
13	Q. Okay. Thank you.	14	you.
14	MS. FISHER: Okay. I just want to go	15	MR. COOK: For the record,
15	through my notes. I believe I'm finished, but we'll	16	Ms. Anderson has been handed a copy of page 101.
16	take a little break. About five minutes; is that all	17	MR. BENNETT: Thank you.
17		18	MS. KEYES: Take your time and read it
18	right? Okay.	19	over.
19	(RECESS.) RECROSS-EXAMINATION	20	THE WITNESS: Okay.
20		21	(PAUSE.)
21	BY MR. BENNETT:	22	A. Okay. The part where my answer was "I can"
22	Q. Ms. Anderson, hi. This is Josh Bennett	23	and then it says, "I can only say I don't recall."
23	again. And I just have a few follow-ups to what your	24	Q. Yes, ma'am.
24	attorney just talked to you about.	25	A. What you're asking is, am I saying that I
25	I want to talk to you specifically about	23	
	Page 218		Page 220
1		1	did not did not that I did not see anything
1 2	the your job sites when you were a contractor with the Navy.	2	did not did not that I did not see anything going on around me?
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	the your job sites when you were a contractor with the Navy. Do you remember Mr. Sturm asking you about those sites yesterday? A. Yes. Q. Okay. And do you remember telling him that you cannot for each of those job sites that you could not specifically recall any construction being done at those job sites? MS. FISHER: Objection. Form. A. No. I didn't I didn't say that I did not recall any construction going on. I said it was ongoing and I observed it over a period of time. Q. All right. Well, can I and I've got a I guess what is a rough copy of your testimony from yesterday, and I'm just going to read a little bit of it. This is page 101, lines 4 to 9. And Mr. Sturm's question was: Okay. You could say specifically with respect to the naval Fifth Naval District position that you didn't recall any construction work going on around you, right? And your answer was: I can only say I don't recall it.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	did not did not that I did not see anything going on around me? Q. I guess my question is and I'll be more specific you have used the word "ongoing" to describe the construction that that you saw. And you've and in talking to testifying to your attorney earlier, you said that you remember it being ongoing over your 22 years in the Navy, correct? A. Correct. Q. Okay. So my question and just to verify what we talked you talked about yesterday with Mr. Sturm is that while you remember some construction being ongoing during your time in the Navy, you do not have a specific recollection of specific construction at a at each particular job site. MS. FISHER: Objection. Form. A. I have recollection of actually seeing these things. After 40 or 50 years, I can't tell you if it was in this hallway, down that hallway, you know, I can only tell you know, I can only tell seeing in it took place or what you know, I can only tell
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Page 223 Page 221 RECROSS-EXAMINATION 1 Q. So I guess I'm still confused. Are you 1 2 BY MR. PORETZ: 2 saying that you do have a specific recollection of 3 Q. I have a couple of follow-ups. My name is specific construction going on, say, for example, at 3 4 4 the Fifth Naval District? Jeff Poretz. MS. FISHER: Objection. Form. 5 A. Yes, Jeff. 5 Q. I just want to be clear on this. You can't A. I cannot tell you specifically where I saw 6 6 place a particular joint compound at a particular 7 7 a worker in a particular building I worked in or what office he was working on or what hallway he was 8 site? 8 9 MS. FISHER: Objection to form, asked working on. I just know that it was -- it was done 9 and answered. 10 during my tenure in the -- in civil service, and I 10 Q. Can you? observed it and -- and it happened at all of these 11 11 12 A. I can only tell you that I observed these facilities. It wasn't just one office I worked in. 12 names in passing, going to work on the job site, 13 Q. And your -- your tenure in civil service 13 being 22 years starting in 1962 and ending in the 14 those three. 14 Q. Okay. 15 mid-1980s? 15 A. It had to have been at one of these 16 A. '85. 16 17 locations that I worked at. 17 Q. '85. Q. But you can't tell me which location a And on a similar point, you've named a 18 18 19 particular product was used? couple of joint compound manufacturers, correct? 19 MS. FISHER: Objection. Form, asked A. Yes. 20 20 21 and answered. 21 Q. Do you have a specific recollection of one A. I can only tell you that it was at one of of those specific joint compound manufacturers at one 22 22 of these sites or is it, again, that you remember it 23 the locations or two or three. 23 24 Q. You're not sure how many of the locations? generally from that 22- or 23-year period that you 24 MS. FISHER: Objection. Form. 25 were working for the Navy? Page 222 Page 224 1 A. Right. MS. FISHER: Objection. Form. 1 Q. Now, I just want to be clear on this. I MR. COOK: Objection to the form. 2 2 think I understand, but just so we're clear, I 3 MS. FISHER: Asked and answered. understand -- what I understand your testimony from A. Over the 22 years, in trying to correctly 4 yesterday and today to be is that you would walk past recollect what I recall from my work period, those 5 5 these construction jobs on your way to your desk, 6 are the only names that I can come up with. 6 7 correct? 7 Q. Well, so do you have a specific MS. FISHER: Objection. Form. 8 recollection of a particular joint compound 8 A. Yes. It would be close by, but it wouldn't manufacturer being, say, at the Fifth Naval District 9 9 be at my desk that this was taking place. 10 10 Station? Q. Right. You would walk past the MS. FISHER: Objection. Form, asked 11 11 construction job to your desk, though? 12 and answered. 12 MS. FISHER: Objection. Form, asked 13 13 A. No, I don't. Q. Is -- is there any job site that you worked 14 and answered. 14 Q. Correct? at while you were a contractor for the Navy where --15 15 A. Yes. 16 that you remember a specific joint compound 16 Q. Okay. And you never stopped to work at the 17 17 manufacturer? MS. FISHER: Objection. Form, asked 18 construction job? 18 19 A. The construction jobs --19 and answered. MS. FISHER: Objection to form, asked 20 A. I can only tell you those are the ones that 20 21 I remember while I was working. 21 and answered. A. -- or the maintenance jobs were in small Q. Over that 22-year period? 22 22

10 (Pages 221 to 224)

buildings, so they were right -- right there.

Q. But you never stopped to work at that

23

24

construction?

23

24

Correct.

25 I've got. Thank you.

MR. BENNETT: Well, I think that's all

Page 227 Page 225 O. But you don't remember what years, what 1 A. I may have stopped and talked to the 1 site the various joint compounds were out? 2 workers. I --MS. FISHER: Objection. Form, asked 3 Q. Do you have any specific recollection of 3 and answered. talking to any of the workers? 4 A. I remember they were over a 22-year period 5 MS. FISHER: Objection. Form. 5 and they occurred all during that time at different A. Well, in -- in a small office, you always 6 7 locations. are friendly and talk to everybody. 7 Q. Okay. Now, the partitions that you spoke Q. Do you remember any particular worker that 8 8 of yesterday and today, looking back at my notes from 9 you talked to and any particular day that you talked 9 yesterday indicates that the partitions were put up to them? 10 for new workers when there were new workers that came MS. FISHER: Objection to form. 11 11 on board? 12 12 A. I can't give you a name. A. Not necessarily. O. But, typically, you would walk past the 13 13 Q. Okay. 14 workers on your way to your desk. Fair enough? 14 15 A. Could be a reorganization, somebody wanted MS. FISHER: Objection. Asked and 15 more office space or they wanted to reorganize --16 16 answered. O. How -- how --17 A. I can't say I did that every time. 17 A. -- a base. Q. Well, your job duties were not to work with 18 18 19 MS. KEYES: Let her finish her answer. the construction --19 Q. Yes, I apologize. Did you finish? 20 A. No. 20 A. Yes. 21 Q. -- folks? 21 Q. How often was there reorganization in your 22 MS. FISHER: Objection. Form. 22 A. But in a small organization, the 23 23 years? 23 A. People were always being moved around -maintenance people perhaps are, you know, people you 24 24 25 Q. And reorganizations typically occurred at work with every day. You just don't --Page 228 Page 226 change of administration in government. Q. Do you remember -- I'm sorry. Did you MS. FISHER: Objection. Form. 2 finish your answer? 2 Q. True? 3 A. That's fine. 3 A. A majority of the time. But there was 4 Q. Did you ever -- do you have any 4 recollection of ever stopping to assist the 5 also --O. That's every -- go ahead. 6 construction workers? 6 A. But there was also an individual head of an 7 A. No. I would never assist a construction 7 office would decide they wanted their people moved worker. That wasn't my job. 8 9 around. Q. Now, as I understand it, the construction 9 O. So a majority of the time, the re --10 you've spoken about in the last two days involves 10 11 reorganizations would occur when there was a change partitions? 11 12 in the administration? MS. FISHER: Objection. Form. 12 MS. FISHER: Objection. Form. 13 13 A. Yes. A. I can't answer that. 14 Q. And any other construction that you're 14 MS. FISHER: Asked and answered, 15 speaking about? 15 mischaracterizes prior testimony. 16 MS. FISHER: Objection. Form. 16 Q. There would be a change in administration 17 A. That's all that I recall. 17 every four to eight years, correct? 18 Q. Um-hum. 18 19 A. Perhaps. A. There was always construction or 19 MS. FISHER: Objection to form. 20 maintenance projects going on, but the only thing I 20 Q. And every four to eight years, there would vaguely remember was the partitions and the --21 21 22 be change -- there would be these new partitions Q. And these are vague recollections? 22 23 going up? MS, FISHER: Objection. Form. 23 24 A. No. A. Well, they must be strong enough that I 24 MS. FISHER: Objection. Form. 25 remember them over that many years. 25

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Q. Okay. Other than change in the administration, do you have any specific recollection of times when partitions went up because of change in personnel?

MS. FISHER: Objection to form.

- A. I can only tell you if somebody put a work order in to have something done, it was done. It happened on an ongoing basis. It didn't necessarily have to be a change of command. And it wasn't every four or eight years. It was all the time.
- Q. Can you give me the number of partitions in the 22 years that went up?

MS. FISHER: Objection. Form.

- A. I never counted them. 14
- Q. Could you give me an estimate? 15

MS. FISHER: Objection. Form, asked and answered. 17

- A. That wasn't my focus. 18
 - Q. Your focus was on your job.

MS. FISHER: Objection. Form.

- A. My job and --21
 - (Witness moves head up and down.)
- 22 O. You had calculators at your job? 23
 - MS. FISHER: Objection. Asked and

25 answered.

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explain further, please do so. Okay?

- A. Okay.
- Q. Other than saying the joint compound 3 manufacturer was one of the three joint compound manufacturers you mentioned earlier, can you tell me the name of a specific joint compound manufacturer or product used at Oceana? 7

MS. FISHER: Objection. Form, asked and answered.

- A. I can only tell you that I observed the different products. I cannot tell you which 11 particular location they were observed at.
- Q. And as I understand that, that would be a 13 14 no? Your answer would be no as to Oceana; is that correct? 15

MS. FISHER: Objection. Form, 16 mischaracterizes testimony. 17

- A. Repeat your question again. 18
- Q. Other than saying that it was one of the 19 three joint compounds, can you tell me the name of a

specific joint compound that was used while you were 21

working at Oceana? 22

MS. FISHER: Objection. Asked and 23

24 answered.

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A. No. It's one of those three. 25

Page 230

MS. KEYES: We did the calculators yesterday, Jeff.

- A. Some of them.
- Q. Do you remember the manufacturer of the calculator?

MS. FISHER: Objection. Form.

- A. They were different ones.
 - Q. Do you remember any of the manufacturers? MS. FISHER: Objection. Asked and

10 answered.

- A. I can't -- I can't tell you that.
 - MR. PORETZ: That's all I have. Thank

13 you.

THE WITNESS: Um-hum.

FURTHER RECROSS-EXAMINATION 15 16 BY MR. COOK:

- Q. Hello again, ma'am. I have a few quick questions. And I'm going to try to make it real 18 quick, but since your attorney went location by location, I'm going to do that as well. 20
 - A. Um-hum.
- Q. I anticipate I'm going to know your 22 response, so I'm going to ask it in yes-or-no 23
- fashion. If you can please answer me yes or no, it 24
- would speed things along. If you feel you need to 25

Q. Okay. And that -- that's what I think your answer is going to be, and I'm just trying to clear up the record because I think it's a little bit

confused right now.

Other than saying it's one of the three joint compounds that you mentioned, can you tell me a specific name of a joint compound that was used while you were working at Dam Neck?

MS. FISHER: Objection. Asked and 9 answered. 10

- A. The same answer. I assume my response was 11 that way, but go ahead. 12
- Q. And so as I understand your answer, you can 13 only say it's one of the three, but you can't tell me a specific name; is that correct? 15

MS. FISHER: Objection. Asked and 16 17 answered.

- A. It was one of those three names. Okay.
- Q. Okay. Other than saying it was one of the 19 three names, can you tell me a name of a specific 20 joint compound that was used while you were working

21 at the Public Health Hospital?

22 MS. FISHER: Objection. Form, asked 23

24 and answered.

A. No.

12 (Pages 229 to 232)

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Q. Other than saying it was one of the three names of joint compounds, can you tell me the name of a specific joint compound that was used while you were working at the Naval Air Station?

MS. FISHER: Objection. Form, asked and answered.

A. No.

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Q. Other than saying it was one of the three joint compounds that you mentioned, can you tell me the name of a specific joint compound that was used while you were working at CINCLANT Fleet the first time?

MS. FISHER: Objection to form, asked and answered.

- 15 A. No.
- Q. Other than saying it's one of the three joint compounds that you've mentioned, can you tell 17 me the name of a specific joint compound that was used while you were working at the staff civil engineering department at the naval station in 20 roughly 1976 to 1978?

MS. FISHER: Objection. Form, asked 22 and answered. 23

- A. Let me ask you on your question --24
- Q. Yes. 25

used, which eliminated those three.

- Q. Okay. I want to know, of those three, can you tell me which one of those three, if you remember which one of those three, was used while you were at the staff civil engineering department at the naval station between 1976 to 1978.
 - A. Now that was clear to me.
- Q. Okay. 8

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- A. No. One of those three.
- Q. Okay. Of the three names that you've mentioned, can you tell me which one of those three 11 names of joint compounds you believe was used at 12 CINCLANT Fleet while you were working there the second time? 14

MS. FISHER: Objection. Form, asked 15 and answered. 16

- A. No. One of those three.
- Q. Okay. And I'm going to -- I'm going to go 18 back just because I think we may be a little bit 19 confused and I want the record to be clear on this. So I'm going to go back through four or five of these 21
- 22 real quick. 23 A. Okay.
- Q. Of the three names of joint compound 24 manufacturers that you've mentioned, can you tell me 25

Page 234

Page 236

Page 235

- A. -- you're saying other than those three, can I name any other? Is that what you said? 2 3
 - O. No. We'll go back to the beginning then.
 - A. No. No.
- Q. Okay. 5
 - A. I just want to make sure that I get --
 - Q. Is that how you understood my questions?
- A. This last one I did, but go ahead. 8
 - Q. Is that how you understood the previous questions?
 - A. No.
 - Q. All right. Well, let me rephrase it so I get back to where we were with the other ones.

Other than saying that it is one of the three joint compounds that you mentioned earlier, can you tell me the name of a specific joint compound that you remember being used while you were working at the staff civil engineering department at the naval station between roughly 1976 and 1978? MS. FISHER: Objection. Form, asked

20 21 and answered.

- A. Maybe I'm not listening closely. I thought you said other than those three --23
- Q. Um-hum. 24
 - A. -- can I think of a specific name that was

- which one of those you remember, if you remember, being used while you were working at Oceana? MS. FISHER: Objection. Form, asked
- and answered. A. No. One of those three.
- Q. Okay. Of the three joint compound manufacturers that you've mentioned, can you tell me which one of those you remember, if you do remember, being used while you were working at Dam Neck?

9 MS. FISHER: Objection. Form, asked 10 11 and answered.

- A. No. One of those three. 12
- Q. Of the three joint compound manufacturers 13 that you remember, can you tell me which one of those, if you do remember, was being used while you 15 were present at the Public Health Hospital? 16

MS. FISHER: Objection. Form, asked 17 and answered. 18

- A. No. One of those three.
- 19 Q. Of the three joint compound manufacturers 20 that you mentioned, can you tell me which one of those three was being used -- strike that. Let me 22 23 rephrase that.

Of the three joint compound manufacturers 24 that you mentioned earlier, can you tell me which one 25

Page 239 Page 237 but I don't know if she has a breathing problem or of those three you remember, if you do remember, 2 being used at the Naval Air Station? Q. Okay. To your knowledge, has she been MS. FISHER: Objection. Form, asked 3 3 treated for emphysema or any type of breathing and answered. 4 condition? I mean, you may see her having some A. No. One of those three. 5 difficulty breathing generally because of age and 6 O. Of the three joint compound manufacturers 6 7 condition -that you remember, can you tell me which one of those 7 three you remember, if you do remember, being used at 8 A. Well, she --8 9 O. -- but specifically a breathing condition CINCLANT Fleet while you were working there the first 9 or a problem with her lungs, to your knowledge? 10 time? 10 A. Well, she's been in the hospital several 11 MS. FISHER: Objection. Form, asked 11 12 times with fluid building up in her lungs, and then 12 and answered. they -- after they do whatever they do to her, then A. No. One of the three. 13 they release her. But prior to this, we haven't MR. COOK: That's all the questions I 14 thought to check her for anything. But I'm certainly 15 have, ma'am. I -- I apologize for having to go back going to do that now. 16 through that. 16 O. Okay. And prior to today, your mother 17 THE WITNESS: That's all right. 17 hasn't gone to be checked for any type of 18 MR. COOK: But thank you very much. 18 asbestos-related condition relating to her lungs to THE WITNESS: Um-hum. 19 19 FURTHER RECROSS-EXAMINATION your knowledge? 20 20 A. Right. And when I -- when I went in the 21 BY MR. RAINSFORD: 21 hospital, I wasn't looking for that either. 22 O. I've got one quick question for you, ma'am, 22 Q. I understand. But -- but the answer is no, 23 if you don't mind. 23 to your knowledge, she has not been tested specific 24 24 The construction guys you saw at these for any type of asbestos-related -various job sites, do you know if they were 25 Page 240 Page 238 No, she has not. 1 government employees? Q. -- condition? 2 A. I have no way of knowing. 2 A. No. MR. RAINSFORD: That's all I have. 3 3 4 MR. ZIOGAS: Okay. Thank you. Thank you. 4 THE WITNESS: Um-hum. 5 5 THE WITNESS: Okay. MS. FISHER: Okay. This concludes the 6 MR. ZIOGAS: May I ask just a couple 6 discovery deposition of Barbara Anderson. 7 7 of questions? MR. COOK: If I could just put a 8 **RECROSS-EXAMINATION** 8 statement on the record before we conclude the 9 BY MR. ZIOGAS: 9 deposition? 10 Q. Ms. Anderson, it may be in my notes and I'm 10 MS. KEYES: Sorry, it's already 11 sorry if I'm duplicating. 11 concluded, Eric. 12 How old is your mother? 12 MR, COOK: I think I was quick enough. 13 A. Eighty-seven. 13 MS. KEYES: You shut up. 14 O. Eighty-seven. 14 MR. COOK: The Defendants reserve the 15 And you told us that she had been disabled 15 right to redepose Ms. Anderson based on the for quite a while. Does she, to your knowledge, have 16 determination by the court as to the attorney/client 17 any type of breathing problems --17 privilege and instruction not to answer questions . MS. FISHER: Objection. Form. 18 18 asserted by Ms. Anderson's counsel during the course Q. - or medical conditions affecting her 19 19 of the Discovery deposition and pending a ruling by 20 20 breathing? the court as to attorney/client -- client privilege A. Well, of course, she is older and she does 21 21 have rheumatoid arthritis in her back. 22 issues. 22 MS. KEYES: And our position is, 23 23 Q. Right. 24 obviously, that the deposition is concluded, not to A. So she's in bed a lot. And she's on 24 be reopened. But, of course, I would listen to a 25 medication a lot, so she does appear to have them,

14 (Pages 237 to 240)

Γ .	Page 241		Page 243
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1.	court on that.	1	TRANSCRIPTION CORRECTIONS CASE NAME: BARBARA ANNE ANDERSON v. ALFA LAVAL, INC.,
2	MR. COOK: I'm sure we all would.	2	et al.
3	That's all I have. Thank you.	3	CASE NO.: 760CL06006790-00
4	(DEPOSITION CONCLUDED AT 11:03 A.M.)	1	WITNESS NAME: BARBARA ANNE ANDERSON - VOLUME II
5		4	DATE:
6		5	PAGE LINE READS SHOULD READ
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_	om to or Monari Canol Nia	1	CERTIFICATE
1	STATE OF NORTH CAROLINA)	2	I, RANAE McDERMOTT, RMR, CRR, a Notary Public
_	SS: COUNTY OF WAKE) VOLUME II	3	in and for the State of North Carolina, do hereby
2	COUNTY OF WAKE) VOLUME II	4	certify that there came before me on January 11, 2007,
ـــــــــــــــــــــــــــــــــــــ	I, BARBARA ANNE ANDERSON, declare under	5	the person hereinbefore named, who had been previously
5	penalties of perjury under the State of North Carolina	6	swom to testify to the truth and nothing but the truth
6	that the foregoing is true and correct.	7	of his knowledge concerning the matters in controversy
7	Executed on thisday of	8	in this cause; that the witness was thereupon examined
8	, 2007, at, North	9	under oath, the examination reduced to typewriting
9	Carolina.		under my direction; and the transcript is a true record
10		11	of the testimony given by the witness.
11		12	I further certify that I am neither attorney
12		13	or counsel for nor related to or employed by, any
13	BARBARA ANNE ANDERSON	14	attorney or counsel employed by the parties hereto or
14		1.5	financially interested in the action.
15	This deposition was signed in my presence by	16	This the 20th day of January, 2007.
16	on theday of	17	
17	, 2007.	18	RANAE McDERMOTT, NOTARY PUBLIC
18		19	Notary No. 1997112018
19		20	
20 21		21	
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23	My Commission expires:	23	
24	ing Commission enpired.	24	
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15 (Pages 241 to 244)

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